

FILED

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

2017 AUG 14 AM 10:36

for the

Central District of California

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
RIVERSIDE

Eastern Division

Craig Hellman, an individual,

ED CV17-01632-JGB (KKX)

Case No.

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Federal Bureau of Investigations, a Government Agency; David Wu, Special Agent of the Federal Bureau; David Wu, an individual, AND DOES 1-25.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Craig Hellman
Street Address	852 W. 13th Street
City and County	Upland, San Bernardino
State and Zip Code	California 91786
Telephone Number	(909)720-8435
E-mail Address	none

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Federal Bureau of Investigations,
Job or Title <i>(if known)</i>	a Government Agency
Street Address	11000 Wilshire Blvd
City and County	Los Angeles, Los Angeles
State and Zip Code	California 90024
Telephone Number	(310)447-6565
E-mail Address <i>(if known)</i>	none

Defendant No. 2

Name	David Wu
Job or Title <i>(if known)</i>	Special Agent
Street Address	11000 Wilshire Blvd
City and County	Los Angeles, Los Angeles
State and Zip Code	California 90024
Telephone Number	(310)447-6565
E-mail Address <i>(if known)</i>	david.wu@ic.fbi.gov

Defendant No. 3

Name	David Wu
Job or Title <i>(if known)</i>	an individual
Street Address	c/o FBI 11000 Wilshire Blvd
City and County	Los Angeles, Los Angeles
State and Zip Code	California 90024
Telephone Number	(310)447-6565
E-mail Address <i>(if known)</i>	david.wu@ic.fbi.gov

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Craig Hellman, is a citizen of the
State of (name) California.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated
under the laws of the State of (name) _____,
and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) David Wu, is a citizen of
the State of (name) California. Or is a citizen of
(foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

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B. Continued as to Defendants:

2. Defendant: Federal Bureau of Investigations is a governmental agency within the State of California;

3. Defendant: David Wu, Special Agent of the Federal Bureau of Investigations is an employee of a governmental agency within the State of California.

Damages to be determined based upon proof of claim and should exceed \$75,000

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On *(date)* 08/15/2014 , at *(place)* West Covina FBI Office related to criminal acts in San Bernardino Couri , the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)* I went to the offices of the FBI to report criminal behavior taking place on the land that my business operated from and where I also resided (11056 S. Benson Ontario CA). I explained how this behavior was causing me mental stress and loss of sleep. That the crimes taking place by the new owners of the land were causing damage to our environment as they were dumping toxic chemicals down the toilets on the property among other issues. It caused a loss of use of my property and business. ALL defendants failed to take needed steps to stop the crime and failed to do the job they were hired for. They were negligent.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)* The FBI failed to ensure their agents acted prudently in investigating crimes that caused me to suffer the loss of my business and the peace of my homelife. I have been severely damaged by their acts.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I brought the criminal acts to the attention of the FBI in person, through multiple correspondence all to no avail. The issues were completely "blown off" by the defendants causing me to continue to suffer from the crime taking place on my land and causing me to ultimately loose my property to crime. I have lost sleep, suffered much mental stress. They had a duty to protect against this type of crime and failed to take any steps necessary to bring the criminals to justice causing me to continue to suffer and it caused the loss of my business that my father ran before I ran (in our family for years).

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

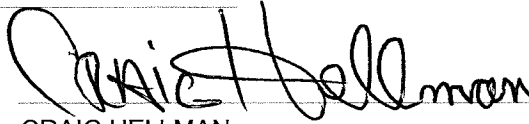
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/13/2017

Signature of Plaintiff

Printed Name of Plaintiff



CRAIG HELLMAN

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

1 I am seeking federal court relief because I had crimes I
2 attempted to report that were happening on property that I used
3 to own and ran my business from and also resided. I provided
4 defendants David WU and the Federal Bureau of Investigations with
5 all of the information they required to investigate the crime and
6 deal with it according to their jobs. However, the defendants and
7 each of them ignored my concerns, were negligent in investigating
8 the claims thereby causing me great financial suffering and
9 emotional harm. Because the crimes continued I was under a
10 tremendous amount of stress causing sleepless nights and
11 emotional stress due to the criminal behavior that was happening
12 within such close proximity of my living and business areas on
13 the land.

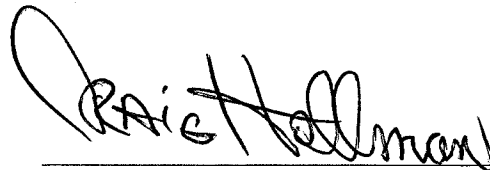
14 On August 6, 2016 I signed a Claim for Damage, injury or Death. I
15 served it by registered US Mail. This claim was ignored.

16 I am seeking damages according to proof.

17 Wherefore, I respectfully request the court grant me the
18 following relief:

- 19 1. Punitive damages according to proof;
- 20 2. Compensatory damages according to proof;
- 21 3. Any such further relief the court deems just and
22 proper.

23
24 Dated: 8/14/17



25 Craig Hellman, In Pro Per
26 Plaintiff
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